

## **REMARKS**

Reconsideration and further examination of the subject patent application in light of the present Amendment and Remarks is respectfully requested. Claims 1-42 are currently pending in the application and stand rejected under 35 U.S.C. §103 as being unpatentable over Weiss in view of Beall, as set forth on pages 2-9 of the Office Action. In view of the claims as presently amended, applicants respectfully traverse this rejection.

The Examiner's rejection under 35 U.S.C. § 103 is based on Weiss as the primary reference and Beall as the secondary reference. Weiss teaches a hierarchical network search engine that clusters hypertext documents. However, Weiss does not disclose, teach or suggest use of categories.

The Examiner states that Weiss teaches *at least part of said entries being mapped to a set of categories, at least part of said entries being associated with keywords*. Applicant respectfully disagrees with this statement and directs the Examiner's attention to remarks filed in the Amendment and Reply (filed on June 1, 2004) to the previous Office Action. The selected remarks, which explain that the clusters disclosed in Weiss are not the same as categories, are reproduced below for the convenience of the Examiner.

The Examiner's rejection under 35 U.S.C. §103 is based on Weiss as the primary reference. In that regard, Weiss does not disclose, teach or suggest use of categories. The Examiner states that Weiss teaches *at least part of said entries being mapped to a set of categories* (see bottom of page 2 of the action). Applicants respectfully disagree with this statement. What Weiss teaches is the clustering of documents, NOT mapping of categories--these are very different approaches, and to one skilled in the art, clustering is fundamentally different from mapping. Indeed, clustering is carried out using a complex algorithm. There is no simple description of the contents of a cluster, so there is no simple and efficient way to restrict a query using a cluster. This means that a cluster is not a tool usable in a query. Rather, the cluster is solely defined at a given time by the set of entries comprised in the cluster. The fact that one entry belongs to a given cluster (and possibly also to other clusters) is not a feature of the entry, but is rather a result of the clustering algorithm. In sharp contrast, in applicants' claimed invention, mapping the entries to a predefined set of

categories makes it possible to restrict a query to one of the categories. The fact that an element is mapped to an entry is a feature of the entry. This feature is not disclosed, taught or suggested in Weiss. (Amendment and Reply filed June 1, 2004).

Moreover, the Examiner states that Weiss discloses *in response to a first query of a user the step of selecting among said set of categories mapped to the entries returned by said query*. Applicant respectfully disagrees with this statement. The clustering result set (page 186, right-hand column) returned by a user query comprises documents that are presented according to their sub-clusters. Documents that belong to the same sub-cluster are placed together in the user screen. Figure 7 of Weiss illustrates a clustered result set that contains five documents grouped into three sub-clusters.

Although clusters should be considered as categories, and this is not recognized by the applicant, Weiss does not teach selecting among said set of categories, at least one category mapped to the entries returned by said query, and displaying said selected categories in addition to the list of entries returned by the query. There is no teaching or suggestion in Weiss that selected categories and selected keywords are displayed in addition to the display of the result set documents. In contrast, Weiss organizes the result set documents to help the user detect duplication because duplicate documents will appear in the same sub-cluster.

The Examiner further states that the secondary reference to Beall teaches the process of *dynamically selecting keywords associated with the entries returned by said query; and displaying to the user said selected categories and said selected keywords; and in response to the user activating one of said displayed categories or said displayed keywords, starting a second query refining the first query to a subset of the entries returned by said first query*. Applicant respectfully disagrees with this statement.

Beall is an electronic catalogue requisition system for efficiently selecting items from a database. Each database entry has a corresponding product category, i.e., “pen” category, and in general will have parameters that can be selected to restrict the display list, for example, “ink color.” Abstract, lines 7-8 and Col. 7, lines 5-11. The *parametric refinement* disclosed in Beall uses predefined categories. Beall does not disclose dynamically selecting keywords associated with the entries returned by said query.

Moreover, the result display in Beall shows a table display 302 including category and descriptive attributes (figure 3, col. 6, lines 25-32). A category display area 304 shows the unique category of product compiled from the list. If several categories were found, each category can be displayed with a corresponding radio button 306. (Col. 3, lines 32-38). The user can narrow the list by selecting one of the categories using said radio button. Significantly, the user does not refine the first query but only selects a sub-category.

Further, there is no motivation to combine the teaching of Weiss and Beall. Indeed, the databases disclosed in Weiss and Beall, respectively, are very different. Weiss addresses complex database with hypertext clustering, while Beall discloses a catalogue database. Combining the features of Weiss and Beall to arrive at applicant’s claimed invention is impermissible hindsight. Even if the person skilled in the art envisaged combining the teachings of Weiss and Beall (this being unobvious, for the reasons cited above), he would not obtain the claimed invention. In fact, as outlined above, no query refining is suggested upon activation of one of the displayed categories or displayed keywords.

In any case, there is absolutely no teaching or suggestion in any of the cited references that the selected categories, mapped to the entries returned by the query, and the selected keywords,

associated with the entries returned by the query, are displayed in addition to the result list; and that a second query is started upon activation of one of the displayed categories or displayed keywords. Applicant submits that this is new and unobvious.

Accordingly, applicant asserts that independent claims 1, 15, 28 and 31 are allowable over Weiss, and that claims depending from the independent claims respectively, are allowable as depending from allowable base claims.

The art made of record by the Examiner but not relied upon as a basis of rejection, does not, whether taken alone or in combination with Weiss and Wesinger, anticipate or render obvious any of applicants' claims as now amended in the application.

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits an early Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

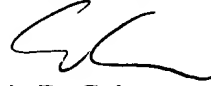
The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or

even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920. A duplicate copy of this sheet(s) is enclosed.

Respectfully submitted,

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March 15, 2005

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